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CMPL SECTION

Environmental Consulting and Engineering

August 4, 1988

Mr. John Chen
Waste Management Division
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Chen:

In accordance with Section XX.2 of the Administrative Order on Consent with the City of St. Louis, Missouri, Docket No. 88-F-0012, Lafser & Schreiber, Inc. hereby certifies that all actions required under this Order to be completed on the "North" section of the Midcoast Aviation property have been completed. (See Figure 1 for description of the "North" section of the Midcoast site.)

The purpose of the project was the removal of hazardous wastes known to exist on the airport property currently leased by Midcoast Aviation. In mid-April 1988, Midcoast's construction contractor, while engaged in excavating soil, unearthed approximately 240 buried drums. Waste identified included pit liquids, non-liquid heels, crushed drums and parts of two trucks. The pit liquids and actual product were subsequently pumped into a total of 81 drums and were stored adjacent



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to the Midcoast property. The drum contents were determined to exhibit characteristic of ignitability as defined by 40 CFR 261.21 and, therefore, a hazardous waste under the Resource Conservation and Recovery Act (RCRA). On July 13, 1988, an Administrative Order on Consent (Docket No. 88-F-0012) became effective upon the receipt of the fully executed Order with the City of St. Louis.

The City of St. Louis contracted Lafser & Schreiber, Inc. to complete the necessary remediation in complying with the Order. Immediately, a Proposed Site Remediation Activities Plan ("Work Plan") was submitted and approved on July 14, 1988 by the EPA. The Work Plan outlined the activities required to adhere to the Order to remediate the Midcoast property. The following describes the activities completed on the Midcoast site. (Note that this summary does not include activities of the Drainage Ditch Area.)

Magnetic and electromagnetic meters were utilized to delineate areas that may contain additional buried metal.

Magnetic data was acquired using an EDA Omni Plus magnetic gradiometer and an EG&G Geometrics G-856 magnetometer. The magnetometers are based on a proton precision method and are capable of measuring to an accuracy of .1 gammas. The G-856

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magnetometer was used to record background fluctuations at a base station located 50 ft. west of the Midcoast site. A Geonics EM31 ground conductivity meter was used to measure the In-phase component and the Quadrature phase component (terrain conductivity) of the induced magnetic field.

The contour plotting of the data indicated three areas which required further investigation, as agreed upon by John Chen (EPA) and Ted Faile (E&E) in a meeting at the EPA on July 22, 1988. Two of the recommended locations were on the Midcoast site and were completed before investigating Area #3. The "North" section of the Midcoast site was free of additional investigation. (See Figure 1 for "Recommended Locations for Additional Investigation".)

To complete actions required by the Order on the "North" section of the Midcoast site, the crushed drums, contaminated soil, non-liquid material with soil were all removed from the Midcoast site and placed south of the Drainage Ditch Area, awaiting disposal at a RCRA landfill (USPCI in Lone Mountain, Oklahoma). Although these wastes did not indicate any characteristic of hazardous waste, to expedite the disposal of this material, it was determined to be "Hazardous Waste Solid, N.O.S."

Although all work required by the Order has not been completed, all actions required for completion on the "North" section of the Midcoast property have been completed. A final report of all activities completed on-site will be submitted to the EPA, including all applicable analyses and deliverables, within two weeks of this certification.

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Should you have any questions concerning the activity undertaken at the Midcoast property, please feel free to call us at (314) 534-2266.

I, the undersigned, do hereby certify that the above summary of activities at the Midcoast Aviation property are true to the best of my knowledge.

Sregory G. Haug P.E.

Robert J// Schreiber, Jr., P.E

lc

cc: Fred Lafser
Gary Holmes
David Bohm

FIGURE 1